

British Columbia Ministry of Justice

Comments Received in Response to *Electoral Boundary Reform: White Paper on Amending the British Columbia Electoral Boundaries Commission Act (November 2013)*

Personal information has been redacted.

Sent: Sunday, November 17, 2013 2:14 PM

To: CPLO Boundaries JAG:EX

Subject: Electoral Boundaries Commission Act White Paper

Our democracy will soon fail, completely, unless electoral processes are changed!

We need:

- a. proportional representation and
- b. limits on donations to political parties and 3rd party advertising
- c. cleaner regulations of 'debates' to enhance citizen understanding not just marketing as per tobacco or junk-food.
- d. limits on publication of 'surveys' and quality of published statistics.

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Sent: Tuesday, November 26, 2013 12:30 PM

To: CPLO Boundaries JAG:EX

Subject: Electoral Boundaries Commission Act White Paper

Hello. I am writing to support maintaining the number of interior and northern Electoral Districts and MLA's. I was born in 1946 in the big city of Vancouver, but I am a British Columbian overall, and I have had the pleasure and privilege of working all across the province, in BC Parks, then in BC Housing. We have lived in the Interior for decades, now.

I have been continually impressed by the sophistication and dedication of the people in the Interior, who are so often discounted by the "elephant in the room" of the Lower Mainland. More and more we seem to be pressed to discount the small cities and towns of the interior, in the guise of "centralisation" of services. It is tearing the heart out of the essence of BC. I don't want the Interior to become a memory shown only in reruns of the Knowledge Network.

It seems to me that there are at least two British Columbias, and even more if you recognize the east Kootenays, and the North, and the First Nations. I don't know how you are supposed to govern such a disparate assembly of cultures, but simply adding more MLA's is not a solution.

The Old Saw about “representation by population” *is not an appropriate rationale for reorganisation* in a province such as ours. It is a deception founded in a long ago culture where there were nothing like the regional disparities we now see in BC.

We do not need more provincial Electoral Districts. And no more MLA’s, because cross-party multiple MLA ED’s are at cross purposes. We have to control the cost of government.

Thank you for the opportunity to comment.

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Sent: Sunday, December 1, 2013 3:15 PM

To: CPLO Boundaries JAG:EX

Subject: Electoral Boundries

Allowing proportional representation in B.C. would eliminate the need to constantly amend the electoral boundries. The current system does not give each vote the same weight. I am also in favour of decreasing the number of MLA's.

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Sent: Thursday, November 28, 2013 12:55 PM

To: CPLO Boundaries JAG:EX

Subject: Electoral Boundaries Commission Act White Paper

I am writing to support the proposals in the subject white paper, particularly the intent to not allow the number of elected representatives to exceed the current number of 85.

As pointed out in the document, continued improvements in transportation and communications technologies, among other innovations in society, allow these individuals a variety of means to effectively carry out their representation and ombudsmen responsibilities now and in future.

In contrast, there does not seem to be any cogent evidence that past increases in the number of electoral districts and the related larger number of elected representatives and associated costs of governance, often simply in response to population increases in metropolitan and suburban areas, have resulted in better citizen representation nor more effective advocacy on their behalf.

I also wish to commend the leadership position taken in the white paper and hope that its spirit is adopted in other jurisdictions including framing an approach towards similarly restricting the growth of the number of federal elected representatives.

Thank you for the opportunity to comment.

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Sent: Monday, January 6, 2014 8:45 PM

To: CPLO Boundaries JAG:EX

Subject: Electoral Boundaries Commission Act White Paper>Bruce Behrhorst

Smells like Gerrymandering to me. I also agree BC Gov't should get court reference ruling on boundaries.

On a cursory read it's funny how for example, the ridings NOC,SKE,SKN,NEC in question are sensitive to population based on ready labor population for corporations like: ConocoPhillips, Encana, Enbridge etc. And it seems some ridings are political party dominant and made 'safe' for; Fed-CONS & BC-LIBS, BC-NDP etc.

I would suggest with Proportional Representation (PR) electoral system boundaries are not such a priority especially with multi-member ridings have more than the current 85 MLAs for adequate representation suggested by BC Citizens Assembly on BC-STV.

People would still have more ballot choices to vote for with BC provincial PR electoral reform.
http://en.wikipedia.org/wiki/File:BC-STV_Boundaries.jpg

PS. More fair elections and proper MLA representation are more important than a nominal expense of facilitating strong democracy in our province.

Sincerely.

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To: CPLO Boundaries JAG:EX

Subject: White Paper on Amending the British Columbia Electoral Boundaries Commission Act

January 6, 2014

IntegrityBC does not support the proposed amendments contained in the White Paper on Amending the British Columbia Electoral Boundaries Commission Act to:

- a) not reduce the number of ridings in the North, Cariboo-Thompson and Columbia-Kootenay regions; and
- b) permit the Commission to set riding boundaries in those three regions that exceed the 25 per cent deviation principle established in the Act without the requirement to find that "very special circumstances" apply.

As the government undoubtedly knows, due to the far-reaching nature of these amendments, they may not be constitutionally compliant and effectively pre-judge the work of the Electoral Boundary Commission.

Under the existing Electoral Boundaries Commission Act, the Commission is given 12 months to produce a draft report and a further six months to complete a final report. The Commission may modify its initial proposals before they submit the final report to the legislature.

The government then has the right to approve, reject or make modifications to any recommendations that the Commission may make.

It is difficult – if not impossible – to justify the need for these additional amendments given the rights already afforded to the government under the existing legislation. The White Paper certainly doesn't provide sufficient reasons for their necessity.

IntegrityBC recommends that a reference be sought from the B.C. Court of Appeal if these amendments are tabled in the legislation and passed, and before they are proclaimed into law, as the government did with its proposed amendments to the Election Act on third party pre-campaign spending limits.

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Sent: Monday, January 13, 2014 4:34 PM

To: CPLO Boundaries JAG:EX

Subject: White Paper on Amending the British Columbia Electoral Boundaries Commission Act

RE: White Paper on Amending the British Columbia Electoral Boundaries Commission Act

I am writing as President of the Canadian Office and Professional Employees Union local 378 to give our feedback on the proposed changes to the British Columbia Electoral Boundaries Commission Act. COPE 378 represents nearly 12,000 workers in B.C.'s private and public sectors.

Our biggest concern with the white paper recommendations is the proposal to restrict the number of seats in the Legislature to 85. The white paper acknowledges the continuing challenge of ensuring fair representation for growing urban areas without reducing the number of districts necessary to have northern and rural voices represented in Victoria. Restricting the number of seats would only exacerbate this issue and make it more difficult for Electoral Boundary Commissions (EBCs) to balance urban and rural needs. It is our view that the appropriate number of seats should continue to be decided through EBCs' proven process of evaluation.

We believe the existing legislation adequately protects rural representation by requiring EBCs to take into account geographic and demographic considerations, as well as accessibility, means of transportation, and physical configuration of a potential constituency.

The existing protections make it unnecessary for legislation to explicitly protect a large number (17) of constituencies in the North, Cariboo-Thompson and Columbia-Kootenay. Writing this strict directive into legislation would again make it more difficult for EBCs to independently consider and act on all the factors they are mandated to.

Legislating a limit on seats and mandating that a large number of them go to these three regions would likely lead to a situation where EBCs are forced to under-assign seats to any growing areas outside these regions.

We urge Minister Anton to reconsider these recommendations and allow upcoming Electoral Boundary Commissions as much independence as possible to continue to do their mandated work to ensure fair representation for all British Columbians.

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The Telecommunications Workers Union
Submission to the Civil Policy and Legislation Office
Justice Services Branch
Ministry of Justice

January 13, 2014

Introduction

The Telecommunications Workers Union (TWU) welcomes the ability to comment on the proposed amendments to the Electoral Boundaries Commission Act (the Act). We have read the White Paper and, in our view, the proposed amendments will take British Columbia further away from the principle of equality of voting power.

Argument

As discussed in *Dixon v. Attorney General of British Columbia* [1989] 35 B.C.L.R. (2d) 273, representation by population is fundamental to electoral apportionment and “the dominant consideration must be population, in particular, relative equality among voters”.

The TWU understands the principle of wishing to protect rural ridings because of the geographic challenges of some of them and, as such, we take no position on this matter.

While the right to ‘effective representation’ is guaranteed by the Charter of Rights and Freedoms, as outlined in *Reference re Prov. Electoral Boundaries (Sask.)*, [1991] 2 S.C.R. 158, the Supreme Court of Canada also found that the first condition of effective representation is relative parity of voting power. By amending the Terms of Reference to ensure protection of some of the rural ridings while not allowing the Electoral Boundaries Commission (ECB) to suggest an overall increase in the number of ridings, the

inevitable result will be greater voting power for some voters versus others. The TWU is very concerned that urban voters will end up having their voting power “unduly diluted” when compared to rural voters. For clarity, the TWU is not necessarily advocating for an increase in the number of seats as we have not done a study on the issue. However, the Telecommunications Workers Union believes that the ECB should not have the end result dictated to them before they even begin their work. The TWU submits that the ECB should be allowed to do their work and, once they have studied and analyzed the current situation, make a recommendation on the proper number of seats. The Legislature has the ability to accept and implement this recommendation or not as they see fit.

Conclusion

While the court in *Dixon* found that the Charter does not require absolute equality of voting power, the TWU believes that the proposed amendments to the Act that will set the Terms of Reference for the Electoral Boundaries Commission will constrain and impede the Commission before they even begin their work. The Telecommunications Workers Union encourages the government to not restrict the Commission to a pre-mandated 85 seats and allow them to undertake their work unrestricted in this area.

* * *

To: CPLO Boundaries JAG:EX

Subject: Regarding Electoral Redistribution & the White Paper

To whom it may concern,

Please let the current legislation & process remain intact.

* * *

January 14, 2014

Civil Policy and Legislation Office Justice Services Branch Ministry of Justice

To whom it may concern,

I am writing in support of the direction of the *White Paper on Amending the British Columbia Electoral Boundaries Commission Act*.

Columbia River - Revelstoke is about as far from Victoria as you can get. There may be other communities in BC that are actually farther away in terms of miles, but in my area, communities like Golden and Revelstoke are farther away from an airport with scheduled service than almost anywhere else in BC. The Selkirk, Monashee, Purcell and Rocky Mountain ranges are real barriers to representation.

It's not just the distance – it's the weather. Weather prevents road travel and makes it very dangerous during avalanche season; it prevents incoming and outgoing flights. It greatly compromises the role of representatives, if they attempt to live in the riding while serving in Victoria. They simply can't get to everything and be everywhere they would like to be, and this challenge will be even greater if the geographic size of the ridings is increased.

As the White Paper correctly notes, this is more than just a northern issue, it is a Cariboo-Thompson issue, and a Columbia-Kootenay issue.

Therefore, I support the White Paper's recommendation to create a "Columbia-Kootenay region" to protect its four seats. While the boundaries have shifted from commission to commission, recent commissions have protected overall representation in this region and should do so in the future.

While previous commissions protected four seats for the region, the overall size of the Legislature increased. As a fiscal conservative, I do not favour increasing the size of the Legislature. Surely 85 MLAs can get the job done – it was 57 not so long ago.

The disparities in population at the federal level between areas like the Labrador, the Yukon and Nunavut compared to Toronto is huge, much more than what we see within BC. We should treat our rural and remote regions in BC with the same amount of respect.

Democracy is not going to fall apart if rural ridings are drawn up with less people than urban ridings. It hasn't fallen apart in the past, and has not fallen apart at the federal level, and in fact, my view is that the vast number of British Columbians supports this type of trade-off.

We must ask as a society how much we value these regions. They are not easy places to live yet they are places of wealth-creation and First Nations diversity. Let's not discourage the settlement of rural and remote BC by rolling back representation.

The White Paper is a fair and reasonable approach in which to update BC's electoral boundaries.

* * *

Sent: Tuesday, January 14, 2014 6:55 PM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Act White Paper

Hi There,

no not in favour of these proposed boundary changes, leave well enough along

* * *

January 14, 2014
Ministry of Justice
PO Box 9222 Stn Prov Govt
Victoria, B.C. V8W 9J1

To Whom It May Concern:

I am writing in support of the *White Paper on Amending the British Columbia Electoral Boundaries Commission Act*.

I believe that the changes outlined in the White Paper are important to ensure that effective regional representation is protected in the North, Cariboo-Thompson and Columbia-Kootenay regions, as well as ensuring that the recommendations of the Electoral Boundary Commission are fiscally responsible.

As the White Paper notes MLA's have two main responsibilities, legislator and as an ombudsperson. A reduction in the number of ridings in the regions noted above would severely affect an MLA's ability to carry out their roles within their constituencies.

The geographical makeup of these regions, invariably compromises the MLA's role as an ombudsperson because they would be required to travel long distances to meet with their constituents while also serving as legislators in Victoria, thus limiting their availability with their constituents. Moreover, unlike urban ridings, rural ridings require a greater role of the MLA, as they do not typically have many government offices to serve residents. Therefore, if the geographic size of these ridings is increased it will lead to a severe reduction in the ability of the MLA to assist their constituents and carry out their responsibilities as MLA.

As the *Saskatchewan Reference* noted, the right to vote is fundamentally a right to "effective representation", which is achieved through being able to communicate with the MLA in your riding so that a constituent can take part in the deliberations of the government, without this the MLA would not be able to fully carry out his role as legislator.

It was also noted *Saskatchewan Reference* that in some cases achieving voter parity might be undesirable as it is important for the legislature to properly reflect the geography, community interests and minority representation of each region when creating or reducing ridings.

It is also important to keep fiscal responsibility in mind; each of the previous four commissions has recommended an increase in the number of MLA's from 57 to 69 to 75 to 81 to 85. It is time to draw the line at the number of growing MLA's and begin to look at ways to support the role of MLA's in geographically large ridings, rather than adding more infrastructure and expense by creating more ridings.

This *White Paper* takes into account the unique realities of the North, Cariboo-Thompson and Columbia-Kootenay regions and ensures that effective representation in these regions is protected as well as being a fiscally responsible option for the update of the electoral boundaries.

* * *

Sent: Tuesday, January 14, 2014 10:24 PM
To: CPLO Boundaries JAG:EX
Subject: Feedback

First of all thank you for taking the time to undergo this review, it is an important ongoing process for the betterment of BC.

I would like more clarification on the extra special circumstances for the 25% deviation. Does this mean projected increases? Or expected economic strength of region? My opinion is this should be better explained and or defined because of the potential for gerrymandering.

I am also more in favor of pursuing representation by population in order to maintain equal representation of voice in the legislature. This could be done through the addition of added MLA's or the re-drawing of district boundaries.

My final point is that I would like greater certainty or assurance of independent action in the redrawing district boundaries thus ensuring impartiality from political party influence.

In summary, I reject the two recommendations listed below.

- address the need to ensure effective representation for northern and rural British Columbians;
- ensure the responsible use of tax dollars by holding the line on the creation of new electoral districts;

Thank you again,

* * *

Sent: Wednesday, January 15, 2014 8:08 PM
To: CPLO Boundaries JAG:EX
Subject: Changing Electoral Boundaries

I am sure that these changes will be to the benefit of the present govt. otherwise why would they be forcing this through with no public debate. The benefit to the govt. will be a few more safe right wing seats and a way to influence any debate in favour of more pipelines more fracking and more oil drilling.

Generally speaking Canada and BC as well have shown that we care nothing about the future of this planet only about money.

So I say to you eat money and drink oil.

* * *

Sent: Thursday, January 16, 2014 8:00 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

January 15, 2014

I didn't manage to get this comment in before midnight Jan 15, so I'm sending it to you before business hours begin the next day instead. Is my comment, below, in time to be considered?

There is not sufficient reason for "protecting" more BC ridings in perpetuity . (No adequate reason, that is, unless it were to lock in a partisan pattern of representation. Perish forbid!) I emphatically reject protection for more ridings at this time. As demographics evolve, this strategy would impose increasingly unfair representation and remove the possibility of readjustment.

If you want more thinly peopled ridings, then divide up the rest of the more populous BC ridings (along reasonable cultural division lines) to maintain parity of representation.. Or else, let bigger populations elect multiple MLAs. (Not a good solution, but less inequitable than your proposal.)

Either of those options requires a bigger Legislature, but that's the only way to have your extra rural ridings without seriously under-representing other populations within our province.

On the other hand, you could ditch such boundary revisions as do not "ensure that each MLA represents about the same number of people." Radical idea.

* * *

Sent: Wednesday, January 15, 2014 11:53 PM
To: CPLO Boundaries JAG:EX; Suzanne.anton.mla@leg.bc.ca; OfficeofthePremier, Office PREM:EX; Dix.MLA, Adrian LASS:EX; contact@andrewweavermila.ca
Subject: Petition saying NO to proposed legislation affecting BC electoral boundaries

Dear BC legislators,

I am very concerned about the proposed legislation affecting BC electoral boundaries. In response, I sent the email pasted into this message (below), and started the petition available here. In just one day, I collected 33 signatures from BC citizens; the list is attached here.

I urge you to reconsider this legislation, which we feel is dangerously anti-democratic.

* * *

Email sent Jan. 15 to CPLOBoundaries@gov.bc.ca:

I am strongly opposed to the bill going before the BC electoral district reform bill going before the BC Legislature in this spring session. This bill goes far beyond the need to preserve a few large, rural ridings (which are already protected in any case) by adding urban ridings in cities like Prince George, which clearly do not need preservation.

The great majority of the seats proposed to be 'preserved' are long-time BC Liberal strongholds. This smacks of gerrymandering and election-fixing, and is profoundly anti-democratic.

These ridings have about half the population of other non-preserved ridings elsewhere in BC, creating a two-tier electoral system in our province, where some votes are worth twice other votes. This is clearly anti-democratic and unacceptable.

This bill has been brought in over the Christmas holiday season, without public or legislative debate, without multi-party discussion and without press coverage until today, at the eleventh hour, on the day when public email and other responses will be closed. This shows the Clark government's disdain and fear for public and parliamentary procedures and signals a tyrannical desire to sneak in potentially damaging legislation by the back door, without political debate or consultation. This is absolutely anti-democratic, despotic behaviour and a shameful way to conduct government in British Columbia.

I urge the provincial government to extend the deadline for public input by at least four weeks, open this bill up to multi-party committee participation and to debate in the provincial legislature. The people of our province deserve a fair and functioning democracy -- particularly the children and young people who will have to live with the results of such unfair and damaging legislation!

* * *

Sent: Wednesday, January 15, 2014 6:26 PM

To: CPLO Boundaries JAG:EX

Subject: Electoral Boundaries Commission Act White Paper

I am opposed to the proposal to protect three regions. This proposal would bring the number of protected ridings to 17 in this province, the number for the rest of Canada.

Response to:

White Paper on Amending the BC Electoral Boundaries Commission Act – Nov '13

The proposed changes to the EBC Act should be reconsidered for at least three reasons:

- 1) The proposal's assertion that sparsely populated areas cause ineffective representation has not been shown.
- 2) The proposed solution needlessly attacks the fundamental democratic principle of equality between voters and will not solve the stated problem of ineffective representation.
- 3) There are better ways to address "Effectiveness of Representation" for all voters, including those in the rural north.

1) *Do sparsely populated areas actually receive less effective representation?*

This proposal suggests that voters in sparsely populated areas are receiving less effective representation than those living in densely populated areas. Is this true?

The White Paper speaks volumes about the importance of rep-by-pop, but says almost nothing about exactly how low population density makes representation more difficult or less effective than in higher density areas.

It is an undocumented assertion that northern rural districts suffer from less effective representation than the urban south.

In cities, travel distances might be short, but cultural and language differences can be vast. Physical distances can be overcome with technology, planning, staff and funding. Cultural differences may be insurmountable.

"Effective Representation" is a concern for all voters, not just those in the rural north.

2) *This proposal attacks the principle of Rep-by-Pop. Why is this bad?*

The BC Government is proposing to interfere with the independent and non-partisan work of the Electoral Boundaries Commission (EBC) to create two classes of voters:

- 1) **Northern/Rural** voters with **enhanced** Legislative Power.
- 2) **Southern/Urban** voters with **diminished** Legislative Power.

The fundamental idea of rep-by-pop is that when MLA's have a single vote in the Legislature, each MLA should represent the same number of voters. By following this principle, every voter has **Equal Legislative Power** over the laws and policies which affect them.

As populations grow in the Lower Mainland and southern Vancouver Island, a smaller percentage of BC's electorate resides in northern and rural areas. Normally, the EBC would reflect this change by creating fewer northern/rural districts and more southern/urban districts. In this way, Equal Legislative Power would be maintained.

How fundamental is the principle of Rep-by-Pop?

When Canada's founders decided to use representation by population, they decided that our democracy would be based on representing people, not geographic areas. In Canada, mountains, trees, lakes and dirt do not have a say in making our laws. In Canada, democratic power arises from the people, not the land.

When we look at maps of Electoral Districts, the boundaries we see are lines encircling groupings of people, not lines defining geographic areas. Electoral boundary maps are misleading. They give the impression that the land itself is a consideration in determining electoral districts.

In Canada, we expect and require that rep-by-pop is achieved.

How to accomplish this is clearly described in the current legislation and follows common sense. Voters are to be grouped based on geographic, demographic, historical and community factors. The current EBC Act says:

*"(a) that the principle of representation by population **be achieved** [emphasis mine], recognizing the imperatives imposed by geographical and demographic realities, the legacy of our history and the need to balance community interest..."*

These provisions **require the EBC to achieve rep-by-pop**. Only secondarily, is the EBC to do this by grouping voters in ways which make sense for the people within those groups. Any diminution of the rep-by-pop principle requires a very clear and compelling rationale.

It's obvious that exact equality would be impossible to achieve, and the courts have stated that perfect equality is not required. But the courts don't say that it's therefore OK to essentially abandon the entire principle, as this proposal does. The legislation, the courts, and common sense, expect and require that we actually achieve representation by population.

This proposal clearly states the importance of the principle of rep-by pop and then directs the EBC to ignore it.

Existing Variances for Defining Electoral Boundaries

The EBC has been given very wide latitude in the number of people in each district. This provision helps to keep voters of similar interests together (+/- 25% of the provincial average).

The current +/- 25% provision makes it possible for some voters (Stikine) to have 3.18 times the Legislative Power of other voters (Surrey-Cloverdale). This huge deviation from rep-by-pop is allowable in the current EBC Act.

Variations in Legislative Power - BC General Election Results 2013

Region	# Voters	# Districts	Voters / MLA (Average)	Legislative Power wrt BC Overall	Legislative Power wrt South Region
BC Total	3,176,455	85	37,370	1.00 x	1.07 x
Cariboo-Thompson	148,222	5	29,644	1.26 x	1.35 x
Columbia-Kootenay	115,860	4	28,965	1.29 x	1.39 x
North	181,405	8	22,688	1.65 x	1.77 x
South	2,730,869	68	40,160	0.93 x	1.00 x

Range of Legislative Power across the Province

District	# Voters	Legislative Power	Legislative Power wrt BC Overall	Legislative Power wrt South Region
Stikine	13,845	wrt Surrey-Cloverdale: 3.81 x	2.70 x	2.9 x
Surrey-Cloverdale	52,817	wrt Stikine: 0.26 x	0.71 x	0.76 x

The new EBC Act would make inequality between voters even worse by directing the EBC to:

1. Ignore the principle of rep-by-pop on a province wide basis.
2. Create 4 new Electoral Regions:
 - Three Regions in the rural north (5+4+8=17 districts).
 - One Region for the rest of the province, mostly south and urban (68 districts).
3. Fix the number of MLAs representing each of these Regions at current levels.
4. Go beyond the +/- 25% population deviation without limit or rationale.
5. Maintain the principle of rep-by-pop only within each Region.

As populations decline in the northern rural regions and increase in the urban south, the Legislative Power of voters will become even more unequal than it is today. Tampering with the fundamental principle that all voters are equal should be a last resort, not the first.

After all, who among us is better or more deserving than another?

3) There are better ways to improve the effectiveness of representation.

There are many ways to address the effectiveness of representation for northern and rural voters without granting them even more Legislative Power than their fellow voters in the urban south:

- 1. Use the technologies which are currently available.** MLAs no longer have to travel over mountain ranges on a horse or up rivers in a boat. For most communication, technology has made distance irrelevant. For example:
 1. Letters, faxes, couriers.
 2. Phone calls, conference calls and voice mail.
 3. Email, PDFs, attachments, digital photos, Google Earth, etc...
 4. FaceTime, Skype, and video conferencing.
- 2. Make broadband available throughout the province.** This would also help with distance learning, business opportunities, employment, etc...
- 3. Increase funding for in-person communication:**
 1. Increase travel budgets for MLAs and staff.
 2. Increased constituency staff and budgets for outreach to remote communities.
 1. Share space, and possibly staff with other levels of government.
 2. Where physical offices are not warranted, schedule regular visits by MLA, constituency staff, and ombuds people, much like a circuit judge.
- 4. Create multi-member districts so that most voters are represented by an MLA who shares their point of view:**
 1. About 50% of voters in BC did not vote for the MLA in their district. These voters are not represented in the legislature and have zero Legislative Power. They have no representation. This is the most important area to make improvements.
 2. In all communities, there are many points of view, but a single MLA can only represent one. Solutions for the entire community require input from all points of view.
 3. Implement the recommendations of the BC Citizens' Assembly on Electoral Reform. This would ensure that:
 1. Every voter has an MLA who they voted for and who represents their point of view when they vote in the Legislature.
 2. All voters have equal Legislative Power.
 3. Voters would have more choice. Voters would have a say in whom, from their preferred party, they would vote for. This would make MLAs more accountable to the people who voted for them.
 4. There would be no safe seats, so there would be a real election in every district, not just in a few targeted swing districts.
 5. Ineffective, single-member MLAs wouldn't always be re-elected because they're from the local dominant party. Voters would be able to vote for a

different candidate from their preferred party. All MLAs would be accountable to the electorate first and then to their political parties.

6. Multiple MLAs from the same district would have to compete with each other during their term in office. They wouldn't be able to ignore their constituents in between elections.
7. Because MLAs would have to face competition from candidates from their own district, MLAs would be more likely to represent their constituents in Victoria and less likely to parrot their party's policy to their constituents.

5. Depoliticize the Ombudsperson role:

1. Can MLAs really be non-partisan?

1. Most MLAs probably think that they and their constituency staff act in a non-partisan manner and this may be true for many issues, but not all.
2. For controversial issues, (anything where there is a difference of policy position between parties) the impartiality of MLAs and their staff cannot realistically be expected.

2. Do voters expect their MLA to be non-partisan?

1. Voters who are partisan, or simply do not share the views of the MLA in their district, may feel uncomfortable seeking ombudsperson services in the MLA's constituency office. These voters do not share the same benefits as other voters.
3. To improve the effectiveness of the ombuds role, increase funding for staff, add local government offices or make regularly scheduled visits to remote areas.
4. Removing the ombuds role from MLA's responsibility would let them focus on their primary responsibility as legislators, representing their constituents.

6. Direct action of government and the legislature to support northern and rural issues:

1. Create a **Ministry of Northern and Rural Affairs**.
2. Create additional Legislative Committees to deal directly with northern and rural issues.
3. Hold meetings of the Legislature, cabinet and committees in northern locations.
4. Invite and pay for more delegations from the rural north to meet in Victoria, to communicate directly with legislative committees.
5. Take the time to address issues important to northern and rural voters.
6. MLAs could take more direction from their constituents and less from their political parties.
7. Political parties could free their MLAs to be more independent and encourage them to speak up more in caucus and allow them to dissent from the party's position in the Legislature.

7. Create a BC Land Trust. Make the BC Land Trust responsible to the legislature, to inform the Legislature and government about the health of our natural capital and the land that we see on those electoral district maps and care so deeply for.

* * *

Sent: Wednesday, January 15, 2014 4:30 PM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

I support the commentary below. Please take this as an official submission on the matter of amending the BC electoral boundaries.

Seek court reference on electoral boundaries commission amendments

January 6, 2014

(Victoria, 6 January 2014) – IntegrityBC is calling on the provincial government to seek a constitutional reference from the B.C. Court of Appeal on its proposed amendments to the Electoral Boundaries Commission Act.

The amendments would require that the Commission not reduce the number of ridings in three regions of the province (the North, Cariboo-Thompson and Columbia-Kootenay). The three regions account for 17 ridings or 20 per cent of the total number in the province.

The organization notes that the amendments may infringe on Section 3 of the Canadian Charter of Rights and Freedoms (right to vote).

“When a government starts tinkering with riding boundaries it needs to tread very carefully, which is why the B.C. government would be well-advised to seek a court reference given the scope of its amendments,” said IntegrityBC executive director Dermod Travis.

In IntegrityBC’s opinion, the government’s White Paper on Amending the British Columbia Electoral Boundaries Commission Act fails to make the case that the act needs to be amended or that 17 out of 85 ridings need to be safeguarded.

“Geographical size in and of itself is somewhat of a red herring and insufficient justification for the extent of the government’s proposals,” said Travis. The ridings include two in Kamloops and two in Prince George.

At 196,000 square kilometres, Stitkine is the largest provincial riding in B.C. and smallest in terms of registered voters, but it’s less than two-thirds the size of B.C.’s largest federal riding and one-tenth the size of Canada’s largest riding.

“These amendments risk pitting regions against regions and that has the potential to create resentment among citizens, neither of which is healthy for a democracy.”

* * *

To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

Hi

I disagree with the proposed changes on the Electoral boundaries.

I believe one person should have one vote and by protecting so many districts, the votes in the other ridings will count for less.

That is not democracy.

I realize that some of the Northern districts are very big and it's difficult for one person to represent the whole area. However, we live in a world where physical space is not as important because of communication on internet.

I want my vote to count just as much as anyone else's, regardless of where I live.

* * *

Sent: Wednesday, January 15, 2014 4:06 PM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

The changes proposed have not yet been adequately vetted by the public. By going light on the public consultation, suspicions and negative public perceptions result. Recommend more public consultation take place and that changes be delayed until more people have had a chance to review and comment. How many times do we need to relearn the importance of appropriate public consultation to get buy-in for changes. We've been down this road many times.

Thank you.

* * *

Sent: Wednesday, January 15, 2014 2:56 PM
To: CPLO Boundaries JAG:EX
Subject: "Apartheid Light"

"History Repeats Itself"

While BC's Minister of Multiculturalism, Teresa Wat seeks input on how the government should apologize for historical injustices toward Chinese Canadians, BC's Minister of Justice introduces a proposal which protects the privileged political status enjoyed by predominantly white rural (Liberal) electoral districts.

Despite great advances in transportation and communication technologies, the BC government clings to

the typically archaic, 19th century excuse of "challenging geography" to indefinitely protect and extend the over-representation of sparsely represented regions.

This proposal shelters 17 electoral districts, of which 11 are Liberal, from any kind of redistribution toward the purpose of equal representation. As a result those who reside in these areas, will have considerably more representation. Worse, this proposal also freezes the rest of British Columbians to 68 seats, no matter how much their population increases.

While some reasonable compromises, offsets and tolerances are needed in a democracy, this goes way too far!

The bottom line: in 2016, when a Chinese or South Asian Canadian, more likely to live in a place like Richmond or Surrey, goes to vote, his or her vote will be worth about half to one third of the Caucasian who votes in a place like Terrace. While the intentions of this white paper may be debated, the results are already clear.

* * *

Sent: Wednesday, January 15, 2014 2:43 PM

To: CPLO Boundaries JAG:EX

Subject: changes to electoral boundaries

I am opposed to the proposed changes to the current BC electoral boundaries.

Thank you

* * *

Sent: Wednesday, January 15, 2014 2:14 PM

To: CPLO Boundaries JAG:EX

Subject: lack of public discussion of this important issue

To the Commissioners:

I am shocked to learn that today is the last day for public comment on the White Paper on the Electoral Boundaries Act and proposal to the BC government. It seems to me that your commission -- and the government that set it up -- has made *no serious attempt* to publicize the process or the proposal, despite the fact that it addresses fundamental aspects of our democracy -- namely, the number and drawing of electoral boundaries with subsequent impact on how many voters are in particular constituencies, and therefore how much each vote actually counts, and also how boundaries can be drawn to favour particular political outcomes or to create that impression.

There has been no apparent outreach, no media blitz, no presence for the issues involved. Open democracy is not just a matter of lack of deliberate secrecy -- it also requires active engagement with

the public.

In my view that active engagement has not remotely happened, or been tried, and the process should be slowed down to include that kind engagement now.

* * *

Sent: Wednesday, January 15, 2014 12:25 PM

To: CPLO Boundaries JAG:EX

Subject: Columbia River-Revelstoke

To Whom It May Concern:

I am writing to you regarding Columbia River-Revelstoke and asking that you support the current boundaries that encompass this constituency. Each time this issue is addressed, I write to support the status quo.

My arguments take in geography and culture. The Columbia River-Revelstoke Electoral District takes in mountain ranges and passes, different time zones and the nearest airport located in Calgary, Alberta. It is a difficult area to represent and travel but the population is not large enabling the MLA to maintain good communication within the district.

The cultural ties within this riding are many. Hunting is a passion throughout. Hiking, fishing, skiing (all kinds) boating, living with wildlife and a deep abiding love and appreciation of our parks, crown land wilderness areas and the outdoors in general is a value shared by all.

Employment in this constituency has many common threads. From end to end, forestry is key! The railway plays a role throughout. Small business, tourism and particularly ski hills in Revelstoke, Golden, Invermere, Fairmont and Kimberley create a cohesive tourism package.

Golf Course's abound from end to end and the Columbia River connects Canal Flats through to Revelstoke. A lot of time and hard work has been put into building bridges between communities in this constituency, tearing apart sections would not be in its best interest.

In conclusion, please keep CR-R intact!

Thank you for the opportunity to provide input.

* * *

Sent: Wednesday, January 15, 2014 2:14 PM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White paper

I would like to state that having read this paper it would appear to me that this has a political agenda behind it as a majority of the Electoral Districts involved are Liberal Party strongholds and they have a lot of seats to lose if any changes are made. These days both Provincial and Federal governments are cutting back on services and letting go employees so I think that politicians should also be cut back and the number of seats in the Legislature and Parliament be REDUCED accordingly. If everyone else who works has to do more with less then so should politicians. A majority of people don't even vote and even less probably use their MLA for any reason which includes myself so our elected officials have even less to do. No doubt those who contact their politicians are probably special interest groups anyway.

* * *

Sent: Wednesday, January 15, 2014 2:09 PM
To: CPLO Boundaries JAG:EX
Subject: Proposal to hobble the Electoral Boundaries Commission

In principle, I am opposed to legislation which prevents the Electoral Boundaries Commission from being free to propose whatever it feels is the most appropriate size, shape and number of electoral districts in the province based on past practice in the province and in other jurisdictions in Canada. It is the responsibility of the Legislature to consider and debate the recommendations. It is wrong for the government to impose increasingly undemocratic restrictions on what the Commission may consider. If there are new rationales for deviations from one person-one vote, it should be the Commission which defines and rationalizes its proposal, not the government.

* * *

To: CPLO Boundaries JAG:EX
Cc: Routley.MLA, Bill LASS:EX; Doug Routley; Horgan.MLA, John LASS:EX; andrew.weaver.mla@leg.bc.ca; outreach@bcombudsperson.ca
Subject: BC Electoral Boundary Commission Input

Comment On The Electoral Boundary Commission Act White Paper:

I heartily object to the notion that the boundaries of 17 of BC's electoral ridings should be fixed. That each citizen's vote in this province does not carry the same weight is antithetical to the fundamental principles of 'good government' and 'representation by population.'

I am further concerned that this is an attempt to politically interfere in a process that should be above and beyond reproach.

Please consider appointing an all-party body to solicit the wisdom and advice of all British Columbia's citizenry.

Thank you.

* * *

Sent: Wednesday, January 15, 2014 1:55 PM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

A democracy requires that as much as possible, people be given equal representation in the legislature. If the population grows in urban areas and declines in rural areas, then corresponding changes must be made in how those people are represented. One solution is to decrease districts in rural areas while adding them in urban areas. Another would be to just add more districts in urban areas. Another option is to group some rural areas with urban areas. But to stick to the status quo by not changing the number of districts AND not making changes corresponding to where the population is located, is undemocratic and unacceptable.

* * *

Sent: Wednesday, January 15, 2014 1:27 PM
To: CPLO Boundaries JAG:EX
Cc: Simons.MLA, Nicholas LASS:EX; gary.holman.mla@lag.bc.ca
Subject: Electoral Boundary

Dear Electoral Boundary Commission;

I am asking that you please extend the period of time to give the public an opportunity to have input into the white paper which came out in November and gives only a short two months, much of which was over the holidays, for the public to have input. Political representation is at the heart of democracy and I urge the commission to demonstrate that it is interested in hearing from the citizens about such a critical things as boundaries, especially as it intends to create two classes of voters in BC. For that will be the result of the proposed "protection" of an additional seven ridings.

Although a small number of protected ridings is common, no other province has 17 of them, as the proposed additional seven more will add up to, and especially not in urban ridings. The question will inevitably arise are these changes part of a partisan political agenda? The only solution, should the commission wish to avoid being seen as tampering with democracy, is to extend the deadline for public submissions by several additional months.

* * *

Sent: Wednesday, January 15, 2014 1:23 PM
To: CPLO Boundaries JAG:EX
Subject: timing/public input

Dear Electoral Boundary Commission;

I am writing to request that you extend the period of time for the public to have input into the white paper which came out in mid November and gives only two months (over the Christmas/New Year period!) for the public to have input. Political representation is at the heart of democracy and I urge the commission to demonstrate that it is interested in hearing from the citizens about such a critical things as boundaries, especially as it intends to create two classes of voters in BC. For that will be the result of the proposed "protection" of an additional seven ridings.

Although a small number of protected ridings is common, no other province has 17 of them, as the proposed additional seven more will add up to, and especially not in urban ridings. The question will inevitably arise are these changes part of a partisan political agenda? The only solution, should the commission wish to avoid being seen as tampering with democracy, and given that these changes were not brought to the public's attention, is to extend the deadline for public submissions by at least an additional two months.

* * *

Sent: Wednesday, January 15, 2014 1:10 PM
To: CPLO Boundaries JAG:EX
Subject: Input on white paper

Electoral Boundary Commission;

The time allowed for input into your white paper was most inadequate, especially as that time included the Christmas holidays. I am asking you to extend the period for input at least by one month, and also to give more publicity to the paper. Electoral boundaries have a significant impact on voters. This proposal would seem to create two kinds of voters -- those in the "protected" ridings and the "others". The general public needs to understand the implications of the changes and we have not had the time nor the opportunity to do so.

* * *

Sent: Wednesday, January 15, 2014 12:53 PM
To: CPLO Boundaries JAG:EX
Subject: Electoral boundries

What do you think you are doing? I have been in senior positions long enough to see through this [redacted]. And I can tell you that I have never before used such language in an email. Well, you have just earned the government a very large number of opponents. You guys are just a gang of thugs. This will come back to bite you hard.

I most sincerely mean every word.

* * *

Sent: Wednesday, January 15, 2014 12:52 PM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

This communist rubber stamping needs to stop. Govt is supposed to be for the people, not the corporations. Overhaul time

* * *

Sent: Wednesday, January 15, 2014 12:37 PM
To: CPLO Boundaries JAG:EX
Subject: Proposed amendments to the Electoral Boundaries Commission Act

I heard about this proposal only today, and am very concerned that indefinitely preserving the boundaries for 17 rural ridings will badly skew the principle of representation by population. The proposal appears to advance the interests of one political party, and has flown under the public radar. This is the kind of action that severely undermines public trust.

* * *

Sent: Wednesday, January 15, 2014 12:22 PM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries

Dear Electoral Boundary Commission,

Please extend the period of time for the public to have input into the white paper which came out in mid-November and gives only two months (over the Christmas/New Year period) for the public to have input. This issue touches the heart of democracy. Please make it possible for the citizens to present

thoughts and ideas about such critical things as boundaries. This is particularly important because it will have the effect of creating two classes of voters in BC. That will be the result of the proposed "protection" of an additional seven constituencies.

Having a few protected constituencies is common. That said, no other province has 17 of them, as proposed, and this is completely inappropriate in urban constituencies. I am sure that you do not want to be remembered as having tampering with democracy, particularly since these changes were not adequately brought to the public's attention. Please extend the deadline for public submissions by at least two more months.

* * *

Sent: Wednesday, January 15, 2014 11:14 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

I do not agree with these proposed changes because they seem unfair.

* * *

Sent: Wednesday, January 15, 2014 11:10 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

Hello,

My name is [name redacted] and I am giving notice that I do not agree with the proposed changes to the guidelines for the electoral boundaries commission. I feel that the current 10 ridings which are protected are adequate. In my opinion the proposed changes are being put forward for political purposes rather than voter equality. Thank you.

* * *

Sent: Wednesday, January 15, 2014 10:59 AM
To: CPLO Boundaries JAG:EX
Subject: response to proposed electoral boundary changes

I just read the White Paper on this topic and I would like to indicate that I have concerns about the extent of the proposed BC electoral boundary changes which seem to create differences of a large extent in the worth of a vote between the rural and urban districts. I would argue for NO change as the present system/organization seems fairer than what is proposed
Thank you

* * *

Sent: Wednesday, January 15, 2014 10:53 AM
To: CPLO Boundaries JAG:EX
Cc: David Eby.MLA
Subject: Electoral Boundaries Commission Act White Paper

To address the White Paper on electoral boundaries:

We are not in favour of your proposed protection of 3 regions and ridings in those regions.

1. We find in the electoral boundary plans that 3 regions: North, Cariboo-Thompson and Columbia-Kootenay are particularly to be protected.

We note that these three regions account for 17 of the province's 85 seats and 14 per cent of its registered voters. Moreover they represent 40 per cent of the seats required to form a majority government.

Seeing this imbalance already exists why are you trying to protect that 40% of the Legislature's seats can be elected by 14% of its registered voters? It can only be a means to protect your interests in future elections.

These protections could enable majority government to be elected by a small fraction of the population. This plan does not rebalance, in fact it is the opposite. This proposed protection is not democratic and fulfilling representation by population. If ensuring minimums of protected representatives in these areas, how will representation in growing urban areas be increased?

Demographics have changed drastically since the first electoral areas were determined.

Your government must realize growth in urban areas in your picture of electoral boundaries.

Increase the seats where population is most dense.

2. I am surprised by the use of Averages charts to justify your plan, this data methods is crude assessment and thus statistically doesn't convey depth of understanding to communicate data. Averages charts are misleading because they do not inform of numbers accurately relative to distribution factors.

As a former teacher in my job of assigning grades to students I know that averages can be the least informative, least accurate, least relevant and most misleading method of assessment and communication. This lack of understanding in your White Paper feeds misinformation to citizens.

Citizens of B.C. should be informed better and will be strongly against your proposed protection of three specific areas. Expect that this Amendment will face constitutional challenge.

* * *

Sent: Wednesday, January 15, 2014 9:57 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

To Whom It May Concern:

I believe in one vote per person no matter how big or small the riding....one vote per person.

* * *

Sent: Wednesday, January 15, 2014 9:40 AM
To: CPLO Boundaries JAG:EX
Subject: Input on the Electoral Boundaries Commission Act White Paper

To whom it may concern,

Please note my opposition to one of the proposals contained in the Electoral Boundaries Commission Act White Paper, specifically that which would expand the number of 'protected' districts.

While I support the protection of some sparsely populated northern districts to ensure fair representation for very large geographic areas, in my opinion there is no good reason to add 4 the populous Prince George and Kamloops districts to the protected list. and the proposal that to do so smacks of gerrymandering.

I look to the electoral boundaries commission to protect the essence of democratic representation and I trust that you will not allow yourselves to be misled by partisan political guidance.

* * *

Sent: Wednesday, January 15, 2014 9:31 AM
To: CPLO Boundaries JAG:EX
Subject: Not in BC's best interest

To whom it may concern,

Having been born and raised in BC, I believe the new boundary changes as currently stated are deceiving and undemocratic.

Had the public been properly notified of the proposed changes back in Oct, and through the fall, this would have been a scandal as it was in 1982 when the Social Credit party (as we know, now called the BC Liberals) made similar boundary changes that was only for political gain, and not in the best interest for BC residents, or a healthy democracy.

The name Gracies finger was given to the sliver of electoral riding where the changes were made in

1982, Grace McCarthy being the MLA involved. That controversy pales in comparison to the changes the Electoral Boundaries Commission is currently suggesting.

Not only that, this decision goes against Section 3 of the Canadian Charter of Rights and Freedoms. Two relevant cases have already come before the courts in Canada that touch on electoral boundaries.

Section 3. In *Dixon v. Attorney General of British Columbia* [1989], the B.C. Supreme Court ruled that electoral boundary distribution was subject to Charter scrutiny as it affected the right to vote. But it's the *Saskatchewan Reference* [1991] before the Supreme Court of Canada on electoral boundaries that has the most relevance to B.C.

In its decision, the Supreme Court ruled that "relative parity of voting power is a prime condition of effective representation. Deviations from absolute voter parity, however, may be justified on the grounds of practical impossibility or the provision of more effective representation."

Again, this is a slap in the face of democracy, and it is not in the best interest of BC residents.

Thank you for your time, I hope this email finds you well.

* * *

Sent: Wednesday, January 15, 2014 9:29 AM

To: CPLO Boundaries JAG:EX

Cc: Simons.MLA, Nicholas LASS:EX

Subject: Need for additional time for public input

Dear Electoral Boundary Commission;

I am writing to request that you extend the period of time for the public to have input into the white paper which came out in mid November and gives only two months (over the Christmas/New Year period!) for the public to have input. Political representation is at the heart of democracy and I urge the commission to demonstrate that it is interested in hearing from the citizens about such a critical things as boundaries, especially as it intends to create two classes of voters in BC. For that will be the result of the proposed "protection" of an additional seven ridings.

Although a small number of protected ridings is common, no other province has 17 of them, as the proposed addition seven more will add up to, and especially not in urban ridings. The question will inevitably arise are these changes part of a partisan political agenda? The only solution, should the commission wish to avoid being seen as tampering with democracy, and given that these changes were not brought to the public's attention, is to extend the deadline for public submissions by at least an additional two months.

* * *

Sent: Wednesday, January 15, 2014 9:11 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral boundaries

The BC Electoral Boundary Commission should create electoral districts which have equal populations. With the exception of a few sparsely populated rural constituencies, no existing electoral districts should have their boundaries protected, and remain as they are today, if their populations have changed.

* * *

Sent: Wednesday, January 15, 2014 8:31 AM
To: CPLO Boundaries JAG:EX
Subject:

I am writing to express concern about the proposed changes to the electoral boundaries in BC.

In particular, I am concerned about the amendment that would safeguard the number of ridings in three regions of the province: the North, Cariboo-Thompson and Columbia-Kootenay. I feel that the BC Liberal government is only proposing these amendments in order to safeguard ridings that overwhelmingly vote for the BC Liberals.

I am also very concerned that this review is taking place in a secretive way. I tried to find information about it on the Ministry of Justice website, and could not without a lot of digging. Election reforms should be conducted in an open and transparent manner, and this does not seem to be what has happened here. If I had not heard someone from Integrity BC speaking about this topic on CBC this morning, I would not have known about it.

* * *

Sent: Wednesday, January 15, 2014 8:08 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

I have had only a brief time to comment on EBC Act White Paper as there has been little public notice given, despite the amount of time that it has been available. Consequently I have only a few comments:

It occurs to me that, given modern digital communications, effective representation is now less determined by geography and distance than it ever has been in the past. Consequently the justification for allowing a deviation of plus/minus 25% is less now than in the past. The allowed deviations should be reduced and I would suggest a goal of 10% by 2020.

With the changes in technology in mind, the number of districts with circumstances such that the deviation exceeds the regularly allowed amount should be minimized. All such districts should have their exceptional circumstances approved by the provincial lieutenant general and by individual votes (one per district) in the legislative assembly.

* * *

Sent: Wednesday, January 15, 2014 8:06 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

Dear Commission Members,

In short the White paper bases its arguments for providing additional exceptioned electoral boundaries on: historical legacies (it's been done before and it is occurring now) should only be considered as to whether they are still reasonable, not as a reason to justify further exceptions; instructions given to the commission by the current government, which was to look into the creation of exceptioned electoral boundaries and did not provide any choice for the commission so that they may reasonably come to any other decision or conclusion.

This smacks of the Commission being put in the position of rubber stamping what appears to be one of current government's thinly veiled objectives and that is the gerrymandering of BC electoral boundaries in favour of one political party, which is clearly against the intent of the provision for the idea of +/-25% exceptions. The intention was to allow certain electorates for exceptional reasons to allow this occur in an electorate. When 17 out of 85 electorates are considered exceptions and this amounts to 20% of the electorate, this is nothing short of stealing the voting power from the remaining 68 electorates.

I wholeheartedly disagree with the report's recommendation and insist on they not be enacted. Some other redistribution must be conceived that is equitable and fair to all voters of BC.

* * *

Sent: Wednesday, January 15, 2014 8:01 AM
To: CPLO Boundaries JAG:EX
Subject: Concern over proposed changes to electoral boundaries

Dear Sir/Madame:

Please note my concern for the proposed increase in the number of 'protected' ridings. I see this proposed change as being fundamentally anti-democratic and a move on the part of the sitting government to strengthen their bases. My concerns more specifically:

1. Undemocratic process: Electoral reforms should be managed through a non-partisan commission and process to avoid the perception of politically motivated manipulation of boundaries
2. Ignoring changing communication technologies: BC already has the highest number of protected ridings by far – given changes to communications technology that makes it easier for MLA's to connect to people in their riding, the number of protected ridings should be going down, not up.
3. Not comparable to other provinces: It is difficult to understand why BC needed 10 protected ridings when Alberta has 2. Again, increasing the number for 10 to 17 is concerning.
4. Inconsistent application of logic: Urban centres outside the lower mainland: Prince George, Kelowna and Kamloops are concentrated urban areas where connecting with constituents does not require any more time or travel than an MLA in the lower mainland. These riding do not need to be protected.

These proposed changes are consistent with other actions of the BC Liberal Government to erode democratic traditions to do more and more business behind closed doors. Since moving to BC 7 years ago, I've gone from being a party member to supporter and sadly, now am neither. Like too many people, I've not taken the time to speak out so have been part of the problem. That has changed.

* * *

Sent: Wednesday, January 15, 2014 7:51 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

The government should seek a constitutional reference from the B.C. Court of Appeal on its proposed amendments to the Electoral Boundaries Commission Act.

The need for these amendments has not been proven.

* * *

To: CPLO Boundaries JAG:EX
Cc: laurie.throness.mla@leg.bc.ca
Subject: Opposition to changes

To Whom It May Concern:

I have just learned of the proposed changes to the electoral boundaries in BC and am disturbed by them for several reasons:

First, the number of proposed protected ridings is more than the rest of western Canada and Ontario combined. I think that some ridings should (and already do) have this protection, but increasing the number from ten to 17 is not consistent with the rest of Confederation.

Second, the proposed changes would give less than 14% of the population more than 20% of the vote in Provincial elections. Understandably, not all ridings can have exactly the same representation, but the proposed changes create a disproportionately high discrepancy of representation between the proposed ridings and the rest of the Province.

Third, the rationale for the proposed changes are said to protect rural regions. Why, then, are four of the ridings urban centers (two in Kamloops and two in Prince George)? This does not fit the rationale.

Fourth, nearly two-thirds of the proposed protected ridings are held by Liberal party incumbents in Liberal strongholds. Protecting these ridings will serve to entrench these partisan ridings, curtailing the democratic process in British Columbia in future Provincial elections. The entire process smacks of gerrymandering.

Finally, such an important process affecting the democratic process in this Province is one that should have been widely advertised and, more importantly, debated in the Legislature. As well, the commission should have been made up of members of all political parties, not just appointed by the Government. The discreetness of the process suggests that the intent of the government was to pass this Act quietly without the due attention of the Public.

My opposition to these changes should be abundantly clear, and the reasoning behind it is sound. I can only hope that these concerns will receive the attention they are due.

* * *

Sent: Wednesday, January 15, 2014 7:20 AM

To: CPLO Boundaries JAG:EX

Subject: NO to proposed BC electoral boundary reform !

I am strongly opposed to the bill going before the BC electoral district reform bill going before the BC Legislature in this spring session. This bill goes far beyond the need to preserve a few large, rural ridings (which are already protected in any case) by adding urban ridings in cities like Prince George, which clearly do not need preservation.

The great majority of the seats proposed to be 'preserved' are long-time BC Liberal strongholds. This smacks of gerrymandering and election-fixing, and is profoundly anti-democratic.

These ridings have about half the population of other non-preserved ridings elsewhere in BC, creating a two-tier electoral system in our province, where some votes are worth twice other votes. This is clearly anti-democratic and unacceptable.

This bill has been brought in over the Christmas holiday season, without public or legislative debate, without multi-party discussion and without press coverage until today, at the eleventh hour, on the day when public email and other responses will be closed. This shows the Clark government's disdain and fear for public and parliamentary procedures and signals a tyrannical desire to sneak in potentially damaging legislation by the back door, without political debate or consultation. This is absolutely anti-democratic, despotic behaviour and a shameful way to conduct government in British Columbia.

I urge the provincial government to extend the deadline for public input by at least four weeks, open this bill up to multi-party committee participation and to debate in the provincial legislature. The people of our province deserve a fair and functioning democracy -- particularly the children and young people who will have to live with the results of such unfair and damaging legislation!

* * *

Sent: Wednesday, January 15, 2014 7:18 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

I disagree with this act. I believe it is undemocratic in the extent of the proposed number of seats that are being allowed to be protected.

I understand the need - but the number of seats is too large, and I see it only as a way for the present government to "protect its rural advantage" in coming elections. The number of seats involved is much larger than any other province. This erodes the value of my vote, and is completely unfair to most citizens of this province.

* * *

Sent: Wednesday, January 15, 2014 7:15 AM
To: CPLO Boundaries JAG:EX
Subject: Electoral Boundaries Commission Act White Paper

Is there a bias here that favours the BC Liberal party, and ensures 'safe' ridings for them?

This smells of gerrymandering, to maintain the power base in BC, and provides unequal representation for all voters in BC.

Why were no hearings publicized for this change, to allow public awareness, and public input?

This is an ill-disguised power-grab for the party in power.

The process for public input should be extended, to allow for a fair hearing and deliberation by the people of BC.

Please provide this opportunity, in the name of transparency and fair policy.

* * *

Sent: Wednesday, January 15, 2014 7:04 AM

To: CPLO Boundaries JAG:EX

Subject: Electoral Boundaries Commission Act White Paper

Please do not pursue this partisan plan of action. 14% of the population does not deserve 20% of the legislature, especially when a majority of these areas are controlled by the sitting party.

* * *

Sent: Wednesday, January 15, 2014 7:02 AM

To: CPLO Boundaries JAG:EX

Subject: Electoral Boundaries Commission Act White Paper

To Whom itMay Concern,

As a citizen of British Columbia, I object to the lack of due process and consultation in developing new electoral boundaries for B.C.

January 15, 2014

I object to the current motion by Liberal Party house leader Mike de Jong to maintain all "rural" ridings including 2 ridings for each of Prince George and Kamloops, despite the distortion in equal representation of all citizens of this province that motion will promote and facilitate. I understand that this is the last day on which such an objection can be lodged and considered. It is, in my view, improper for both ridings in each of Prince George and Kamloops, which are clearly not rural areas and which are no more logistically demanding to represent than a constituency in Victoria, to be accorded protected status.

I expect a cogent reply.

Yours truly,

From: [REDACTED]
Sent: Friday, January 17, 2014 11:39 PM
To: AG WEBFEEDBACK AG:EX
Subject: electoral boundaries

I write to you because I feel this should be a public conversation. A debate in the legislature. And it has not been.

Open this up to more public debate and scrutiny and you will receive a varied and vast number of ideas. How can more ideas be undesirable. Some of which may be very good.

I just found out about this redistribution on Wednesday of this week.

Fortunately the time for comment was extended till Friday.

So, why do existing levels of representation in northern and rural ridings have to be maintained and that there will be no reduction in electoral districts in those areas? This is the question proposed but it doesn't feel answered in the rest of the white paper.

To suggest that northern or other electoral boundaries should be such that an MLA for one of these areas may be elected by considerably less people than it takes to elect an MLA in the lower mainland is just a fundamentally flawed idea notwithstanding what the supreme court might say regarding special circumstances.

And as it states below table 1, if electoral districts are allowed to vary by up to 25 per cent above or below the average population per district then it might be possible to have one MLA represent 62,000 people and another represent 32,000. And this 25% is not absolute and can be exceeded in special circumstances.

This 25% variation above and below the average needs to be made a much smaller % and I don't know how one defines special circumstances.

Giving more power to one vote over another can begin to erode democracy.

It is true that federally there is a large discrepancy between some federal ridings if for example a PEI electoral area is compared to an Ontario electoral area. In some ways these are understandable given that there are provincial boundaries at play and a confederation that sets out some rules for the various provinces.

Within a province the case is less compelling. And the variation between a rural riding and an urban riding cannot be made understandable by suggesting that there is a special case to be considered. Are people in northern ridings so different from residents in other ridings?

Elected MLAs are elected (presumably) to consider the interests of all residents of the province while at the same time balancing the issues of all electoral boundaries.

A large geographical area does not itself make a special circumstance.

The smaller the group of people electing their representative the greater the chance for an ideology (and there are many of them) to be the single issue that elects the MLA.

This is not how good governance begins and I suggest it may be the beginning of dysfunctional government. Look to our neighbors to the south. Wyoming gets the same representation as California in their senate.

I wish you thoughtful consideration.

[REDACTED]

Comments on the Electoral Boundaries Commission Act White Paper

14



Abstract

The changes proposed in the "White Paper on Amending the BC *Electoral Boundaries Commission Act*" do a poor job of ensuring effective representation throughout British Columbia.

The population of the current districts, and the dispersion of population in those districts were analyzed for this paper, and I conclude that:

- The proposed changes will **permanently protect** districts that do not require protection.
- The proposed changes will leave **permanently unprotected** districts that are quantifiably just as difficult to serve as some of the most northerly districts in the province.

If the government is determined to provide rural areas protection in an 85 seat legislature, I recommend **against** protecting **particular regions** in legislation. Rather, the government should simply increase the allowed deviation from the average from 25% to 35%, and allow the deliberative Commission process to determine the appropriate relative populations of different districts within that rule.

Please see the spreadsheet submitted with this document for complete statistics.

Purpose of the Commission

Reading the white paper and the proposed changes to the Act, it is clear that the thrust of the changes is to pre-decide the principle of “effective representation”, as discussed in the *Saskatchewan Reference*.

The current form of the Act already makes provision for ensuring that “effective representation” is maintained: it appoints an expert Boundary Commission that will evaluate all the data available, entertain submissions from the public and balance the concerns of equality of population with difficulty of representation. The Commission process generates a set of boundaries that provide effective representation.

The proposed changes preempt that process by stipulating in advance that a large swath of the province must receive disproportionate representation. Ignoring for the moment that the Act and Commission process already protect effective representation, it is worth quantifying: would the government proposal provide effective representation province-wide?

Current Population Balance

An analysis of the population as measured in the 2011 census shows the following situation in BC's electoral districts:

- The current **provincial average population** is **51,765** per riding.
- The current population distribution is extremely lopsided, with the most heavily populated riding (Surrey-Cloverdale, 73,042) having well over 3 times the population of the least populated (Stikine, 20,238)
- The average population in the 17 "protected" ridings is 35,609, **31% less** than the provincial average.
- The average population in the 68 "unprotected" ridings is 55,804, 8% higher than the provincial average.
- A vote in the protected regions will be over 1.5 times more "powerful" than one in the unprotected regions.

The current population figures are already three years old, and will be seven years old by the time of the next election, using the newly redistributed electoral districts. The deviation of the "protected" regions from the provincial average, already 31% below average, **can only be expected to get worse**.

Current Population Deviations

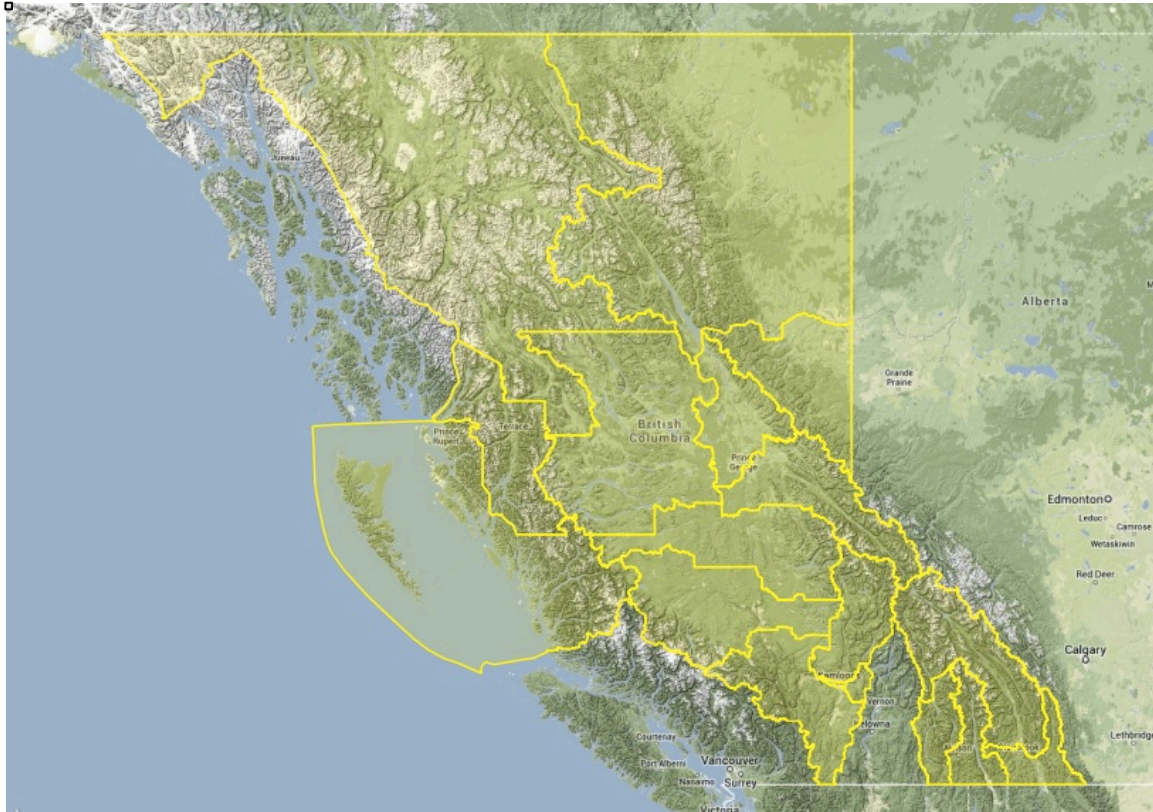
RIDING	REGION	2011 POP'N	DEVIATION
Stikine	North	20238	-61%
North Coast	North	22322	-57%
Peace River South	North	26349	-49%
Nechako Lakes	North	26975	-48%
Skeena	North	29575	-43%

RIDING	REGION	2011 POP'N	DEVIATION
Cariboo-Chilcotin	Cariboo-Thompson	29632	-43%
Fraser-Nicola	Cariboo-Thompson	30536	-41%
Columbia River-Revelstoke	Columbia-Kootenay	32242	-38%
Cariboo North	Cariboo-Thompson	32755	-37%
Nelson-Creston	Columbia-Kootenay	37045	-28%
Boundary-Similkameen	Okanagan	38163	-26%
Kootenay East	Columbia-Kootenay	38869	-25%
Peace River North	North	39311	-24%
Kootenay West	Columbia-Kootenay	40650	-21%
Alberni-Pacific Rim	Vancouver Island & South Coast	43423	-16%
Prince George-Mackenzie	North	45011	-13%
Delta South	Richmond & Delta	46648	-10%
Prince George-Valemount	North	46951	-9%
Powell River-Sunshine Coast	Vancouver Island & South Coast	48328	-7%
Vancouver-West End	Vancouver	48596	-6%
Oak Bay-Gordon Head	Vancouver Island & South Coast	48889	-6%
Victoria-Swan Lake	Vancouver Island & South Coast	50118	-3%
Esquimalt-Royal Roads	Vancouver Island & South Coast	50183	-3%
Chilliwack-Hope	Fraser Valley	50737	-2%
Abbotsford West	Fraser Valley	50783	-2%
Saanich South	Vancouver Island & South Coast	50827	-2%
Victoria-Beacon Hill	Vancouver Island & South Coast	51550	0%
Parksville-Qualicum	Vancouver Island & South Coast	52037	1%
Chilliwack	Fraser Valley	52248	1%
Surrey-White Rock	Surrey	52281	1%
Juan de Fuca	Vancouver Island & South Coast	52325	1%
Kamloops-North Thompson	Cariboo-Thompson	52479	1%
West Vancouver-Sea to Sky	North Shore	52569	2%
Nanaimo	Vancouver Island & South Coast	52695	2%
Nanaimo-North Cowichan	Vancouver Island & South Coast	52710	2%
Port Moody-Coquitlam	Tri-Cities	52740	2%
Abbotsford-Mission	Fraser Valley	53039	2%
Abbotsford South	Fraser Valley	53376	3%
Burnaby-Lougheed	Burnaby & New Westminster	53383	3%
North Vancouver-Seymour	North Shore	53407	3%
Delta North	Richmond & Delta	53771	4%
Vancouver-Mount Pleasant	Vancouver	54238	5%
Kamloops-South Thompson	Cariboo-Thompson	54417	5%
Coquitlam-Burke Mountain	Tri-Cities	54418	5%
North Island	Vancouver Island & South Coast	54510	5%
Burnaby-Deer Lake	Burnaby & New Westminster	55074	6%
Maple Ridge-Pitt Meadows	Fraser Valley	55226	7%

RIDING	REGION	2011 POP'N	DEVIATION
Vancouver-Fairview	Vancouver	55361	7%
Penticton	Okanagan	55492	7%
Shuswap	Okanagan	55520	7%
Coquitlam-Maillardville	Tri-Cities	55576	7%
Vancouver-Hastings	Vancouver	55796	8%
West Vancouver-Capilano	North Shore	55955	8%
Port Coquitlam	Tri-Cities	55963	8%
Maple Ridge-Mission	Fraser Valley	56107	8%
Vancouver-False Creek	Vancouver	56218	9%
Saanich North and the Islands	Vancouver Island & South Coast	56270	9%
Vancouver-Quilchena	Vancouver	56448	9%
Burnaby-Edmonds	Burnaby & New Westminster	56893	10%
Surrey-Fleetwood	Surrey	56925	10%
Vancouver-Langara	Vancouver	57032	10%
Vancouver-Point Grey	Vancouver	57056	10%
North Vancouver-Lonsdale	North Shore	57091	10%
Cowichan Valley	Vancouver Island & South Coast	57357	11%
Westside-Kelowna	Okanagan	57590	11%
Surrey-Green Timbers	Surrey	57695	11%
Vancouver-Kensington	Vancouver	57796	12%
Kelowna-Mission	Okanagan	57977	12%
Burnaby North	Burnaby & New Westminster	58134	12%
Surrey-Tynehead	Surrey	58306	13%
Kelowna-Lake Country	Okanagan	58782	14%
Richmond-Steveston	Richmond & Delta	59125	14%
Vancouver-Kingsway	Vancouver	59342	15%
Vancouver-Fraserview	Vancouver	59782	15%
Surrey-Newton	Surrey	59828	16%
Surrey-Whalley	Surrey	60399	17%
Vernon-Monashee	Okanagan	61400	19%
Comox Valley	Vancouver Island & South Coast	63557	23%
Langley	Columbia-Kootenay	64025	24%
Richmond East	Richmond & Delta	65312	26%
Fort Langley-Aldergrove	Fraser Valley	65799	27%
New Westminster	Burnaby & New Westminster	65893	27%
Richmond Centre	Richmond & Delta	66036	28%
Surrey-Panorama	Surrey	69528	34%
Surrey-Cloverdale	Surrey	73042	41%

Protected Electoral Districts

A map of the protected electoral districts shows that they cover huge a contiguous area that includes the majority of the land area of the province.



Visually, it appears that these districts are indeed distinct from the other areas of the province. But **members of the legislature do not represent rocks and trees, they represent people.**

The distribution of **people** in the protected districts is not unique at all. Many unprotected electoral districts have exactly the same distribution of people as protected districts.

Effective Representation

The "*White Paper on Amending the BC Electoral Boundaries Commission Act*" presents a succinct and correct understanding of the tension between the roles of a Member of the Legislative Assembly (MLA).

- The "legislator role" requires district populations to be as equal as possible, so that citizens have equal votes.
- The "ombudsperson role" requires the MLA to access the citizens personally, so that "a large district with a number of distant communities requires the MLA to travel to those communities to meet with constituents".

This characterization of difficult districts for the "ombudsperson role" has **one substantial error** in it. It is true that a district with "distant communities" will be

hard to services, and the more communities in a district, and the further apart they are, the harder the district will be to service. However, the **area of the district**--how physically large it is--is **irrelevant**.

Population Density is a Misleading Statistic

Calculating the population density of a district is a simple matter: divide the district's area by its population. However, the population density is only a useful measure of "difficulty to service" if the population is uniformly distributed over the area. This is almost never the case.

For example, the protected riding of *Skeena* is the 10th largest by area and 10th least dense. But two thirds of the population of Skeena resides in just two cities: Kitimat and Terrace, separated by a 1 hour highway drive. (The number rises to almost 90% if you include the portions of Terrace outside city limits.)

Compare that to *Powell River-Sunshine Coast*, which by population density is twice as dense as *Skeena*. However, only 50% of the population resides in the three major communities (Powell River, Sechelt and Gibsons) which are in turn separated by a two hour road and ferry route. The remainder of the district population is spread out in numerous islands.

Despite the disparity in ease of access, *Skeena* currently has a deviation of **43% below** the provincial average while *Powell River-Sunshine Coast* is only 7% below.

Population density is a poor measure of how difficult a riding is for an MLA to service.

Population Dispersion is Better Statistic

Population dispersion is calculated by looking at the distribution of **people** throughout a district. Empty areas with no people do add to the dispersion measure of a district. Areas with people that are close together add less to the measure than areas with people far apart.

The dispersion is calculated using census blocks. Each electoral district contains between 600 and 800 census blocks. The dispersion measurement calculates the population-weighted distance between every pairing of blocks in the district.

- Block pairings with low populations will be weighted very low.
- Block pairings with low distances will also receive low weights.
- Block pairings with large populations and large distances will contribute more to the final statistic.

It's fairly easy to visualize how a district with only one large community will have a lower dispersion than one with two or more separated communities. The more communities, and the further apart they are, the higher the dispersion will be.

The formula for dispersion is:

$$\frac{\sum_{i=1}^n \sum_{j=1}^n p_i p_j d_{ij}}{\sum_{i=1}^n \sum_{j=1}^n p_i p_j}$$

Where **p** is the population of a block and **d** is the distance between blocks.

Current Population Dispersions

The following tables shows dispersion calculated using the 2011 census.

Note that while many of the "protected" ridings are quite dispersed, some "unprotected" ones are as well: *North Island, Boundary-Similkameen, West Vancouver-Sea to Sky, and Powell River-Sunshine Coast.*

RIDING	DISPERSION	REGION	POP'N	DEVIATION
North Coast	126.9	North	22322	-57%
Columbia River-Revelstoke	111.6	Columbia-Kootenay	32242	-38%
Stikine	109.8	North	20238	-61%
Peace River North	94.9	North	39311	-24%
Nechako Lakes	84.0	North	26975	-48%
Fraser-Nicola	75.1	Cariboo-Thompson	30536	-41%
Cariboo-Chilcotin	64.7	Cariboo-Thompson	29632	-43%
North Island	64.0	Vancouver Island & South Coast	54510	5%
Cariboo North	47.4	Cariboo-Thompson	32755	-37%
Peace River South	46.2	North	26349	-49%
Nelson-Creston	46.1	Columbia-Kootenay	37045	-28%
Boundary-Similkameen	46.1	Okanagan	38163	-26%
West Vancouver-Sea to Sky	45.7	North Shore	52569	2%
Powell River-Sunshine Coast	43.1	Vancouver Island & South Coast	48328	-7%
Kootenay West	37.8	Columbia-Kootenay	40650	-21%
Prince George-Valemount	37.6	North	46951	-9%
Skeena	35.3	North	29575	-43%
Kootenay East	34.7	Columbia-Kootenay	38869	-25%
Prince George-Mackenzie	30.9	North	45011	-13%
Alberni-Pacific Rim	30.6	Vancouver Island & South Coast	43423	-16%
Kamloops-North Thompson	27.6	Cariboo-Thompson	52479	1%
Shuswap	25.7	Okanagan	55520	7%
Chilliwack-Hope	21.0	Fraser Valley	50737	-2%
Nanaimo-North Cowichan	16.2	Vancouver Island & South Coast	52710	2%
Kamloops-South Thompson	15.2	Cariboo-Thompson	54417	5%
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Cowichan Valley	13.7	Vancouver Island & South Coast	57357	11%

Penticton	11.8	Okanagan	55492	7%
Juan de Fuca	10.8	Vancouver Island & South Coast	52325	1%
Comox Valley	9.8	Vancouver Island & South Coast	63557	23%
Maple Ridge-Mission	9.5	Fraser Valley	56107	8%
Vernon-Monashee	9.2	Okanagan	61400	19%
Kelowna-Lake Country	9.1	Okanagan	58782	14%
Fort Langley-Aldergrove	8.8	Fraser Valley	65799	27%
Westside-Kelowna	7.9	Okanagan	57590	11%
Abbotsford-Mission	7.6	Fraser Valley	53039	2%
Kelowna-Mission	5.9	Okanagan	57977	12%
Abbotsford South	5.5	Fraser Valley	53376	3%
Delta South	5.2	Richmond & Delta	46648	-10%
Surrey-Cloverdale	5.0	Surrey	73042	41%
Chilliwack	4.6	Fraser Valley	52248	1%
Surrey-Panorama	4.4	Surrey	69528	34%
Esquimalt-Royal Roads	4.2	Vancouver Island & South Coast	50183	-3%
Richmond East	4.1	Richmond & Delta	65312	26%
Nanaimo	4.0	Vancouver Island & South Coast	52695	2%
Maple Ridge-Pitt Meadows	3.9	Fraser Valley	55226	7%
North Vancouver-Seymour	3.9	North Shore	53407	3%
Langley	3.8	Columbia-Kootenay	64025	24%
Saanich South	3.6	Vancouver Island & South Coast	50827	-2%
Oak Bay-Gordon Head	3.4	Vancouver Island & South Coast	48889	-6%
West Vancouver-Capilano	3.3	North Shore	55955	8%
Port Moody-Coquitlam	3.1	Tri-Cities	52740	2%
Abbotsford West	3.1	Fraser Valley	50783	-2%
Surrey-Tynehead	3.0	Surrey	58306	13%
Burnaby-Lougheed	3.0	Burnaby & New Westminster	53383	3%
Surrey-White Rock	2.8	Surrey	52281	1%
Coquitlam-Maillardville	2.8	Tri-Cities	55576	7%
Vancouver-Point Grey	2.7	Vancouver	57056	10%
Port Coquitlam	2.6	Tri-Cities	55963	8%
Delta North	2.4	Richmond & Delta	53771	4%
Surrey-Whalley	2.3	Surrey	60399	17%
Surrey-Green Timbers	2.3	Surrey	57695	11%
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Surrey-Newton	2.3	Surrey	59828	16%
Victoria-Swan Lake	2.3	Vancouver Island & South Coast	50118	-3%
Burnaby North	2.2	Burnaby & New Westminster	58134	12%
Surrey-Fleetwood	2.1	Surrey	56925	10%
New Westminster	2.1	Burnaby & New Westminster	65893	27%
Burnaby-Edmonds	2.1	Burnaby & New Westminster	56893	10%
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Vancouver-Mount Pleasant	1.8	Vancouver	54238	5%
Victoria-Beacon Hill	1.7	Vancouver Island & South Coast	51550	0%
Vancouver-Hastings	1.6	Vancouver	55796	8%
Vancouver-Kensington	1.6	Vancouver	57796	12%
Vancouver-Kingsway	1.5	Vancouver	59342	15%
Vancouver-Fairview	1.5	Vancouver	55361	7%
Vancouver-False Creek	1.2	Vancouver	56218	9%
Vancouver-West End	0.7	Vancouver	48596	-6%

Marginal Cases

Kamloops-South Thompson

The least dispersed of the "protected" ridings is *Kamloops-South Thompson*. Even on the basis of population density, it is not particularly thin, and in dispersion it is extremely low. The basic geography of *Kamloops-South Thompson* is a big chunk of Kamloops and a string of smaller communities laid out to the east for 50KM along Highway 1.

Nanaimo-North Cowichan is an "unprotected" district, and only slightly more dispersed than *Kamloops-South Thompson*. In layout, it is almost identical, only oriented north/south rather than east/west: it consists of a hunk of Nanaimo, and a string of smaller communities laid out to the south for 45KM along Highway 1 (and some settled islands).

Parksville-Qualicum is an "unprotected" district, and is slightly less dispersed than *Kamloops-South Thompson*. In layout, it is also very similar: it consists of a piece of north Nanaimo, the city of Parksville and a string of smaller communities laid out to the north for 25KM along Highway 1 (and some settled islands).

There is **absolutely nothing exceptional about *Kamloops-South Thompson***. It has the same basic geography and population dispersion as other "unprotected" district. There many far more dispersed districts in the province deserving of protection: *Shuswap*, *Alberni-Pacific Rim*, *Powell River-Sunshine Coast*, *North Island* and others.

North Coast

The most dispersed of the "unprotected" districts is *North Island*. It is the 8th most dispersed district in the province, and yet currently has a population **5% above** the provincial average.

Although two thirds of the population of 54,510 live in metro Campbell River, the remaining third is spread out sparsely along the three hour drive north to Port Hardy, and in remote towns like Port Alice, Zeballos, Tahsis, and Gold River.

Like the MLA from *Skeena*, the MLA from *North Island* will require about four hours to get home from the Legislature (driving the Island highway, rather than flying). However, the MLA from *North Island* will represent almost twice as many people spread out over many more communities, placed further apart. The drive time from Terrace to Kitimat is one hour. The drive from Campbell River to Port Hardy is three.

In terms of geographical layout, rural economy, population dispersion, and even raw area, North Island is just as deserving of protection as any in BC, but the region-oriented white paper proposal leaves it unprotected.

Conclusion & Recommendations

There are other measures and factors that could be brought into the evaluation of dispersion and effectiveness of representation.

However, even the simple dispersion measurement presented here is a useful tool to evaluate the proposed changes to the Electoral Boundaries Commission Act:

- The proposed changes will **permanently protect** districts (e.g. *Kamloops-South Thompson*) that do not require protection.
- The proposed changes will leave **permanently unprotected** districts (e.g. *North Island*) that are quantifiably just as difficult to serve as some of the most northerly districts in the province.
- About the middle, the proposed changes protect and leave unprotected districts that are, from a population dispersion point of view, basically identical.

Retaining an 85 seat Legislature is a reasonable goal. There is little enough space in the chamber, and a larger province can support larger districts.

Protecting difficult to represent districts is also a reasonable goal. However, the proposal prejudices the work of the Commission in determining which districts require special protection.

If the government is concerned about rural representation in an 85 seat house, I recommend that it should instead **simply increase the allowed deviation to 35% below average**, and let the Commission figure out the best way to ensure effectiveness, rather than enshrining the current regions in law.

However, at some point in the future, the continued urbanization of BC will require representation reductions from rural areas, both in the north and on the remote coasts. Perhaps this redistribution cycle is the time to grasp the nettle, leave the deviation unchanged at 25%, and leave the Commission process to do the necessary and difficult work.

CODE	RIDING	DISPERSION	REGION	POPULATION	AREA	HA/PERSON	PROTECTED	DEVIATION
NOC	North Coast	126.9	North	22322	14392413	644.76	Y	-57%
CLR	Columbia River-Revelstoke	111.6	Columbia-Kootenay	32242	3971399	123.17	Y	-38%
SKN	Stikine	109.8	North	20238	19643885	970.64	Y	-61%
PCN	Peace River North	94.9	North	39311	17580856	447.22	Y	-24%
NEC	Nechako Lakes	84.0	North	26975	7375695	273.43	Y	-48%
FRN	Fraser-Nicola	75.1	Cariboo-Thompson	30536	3378795	110.65	Y	-41%
CBC	Cariboo-Chilcotin	64.7	Cariboo-Thompson	29632	4329465	146.11	Y	-43%
NOI	North Island	64.0	Vancouver Island & South Coast	54510	4507466	82.69	N	5%
CBN	Cariboo North	47.4	Cariboo-Thompson	32755	3983800	121.62	Y	-37%
PCS	Peace River South	46.2	North	26349	3034011	115.15	Y	-49%
NEL	Nelson-Creston	46.1	Columbia-Kootenay	37045	1322025	35.69	Y	-28%
BDS	Boundary-Similkameen	46.1	Okanagan	38163	1116553	29.26	N	-26%
WSS	West Vancouver-Sea to Sky	45.7	North Shore	52569	964205	18.34	N	2%
POR	Powell River-Sunshine Coast	43.1	Vancouver Island & South Coast	48328	2097876	43.41	N	-7%
KOW	Kootenay West	37.8	Columbia-Kootenay	40650	1201560	29.56	Y	-21%
PRV	Prince George-Valemount	37.6	North	46951	3153906	67.17	Y	-9%
SKE	Skeena	35.3	North	29575	3163739	106.97	Y	-43%
KOE	Kootenay East	34.7	Columbia-Kootenay	38869	1117201	28.74	Y	-25%
PRM	Prince George-Mackenzie	30.9	North	45011	2036132	45.24	Y	-13%
APR	Alberni-Pacific Rim	30.6	Vancouver Island & South Coast	43423	1314180	30.26	N	-16%
KAN	Kamloops-North Thompson	27.6	Cariboo-Thompson	52479	2162723	41.21	Y	1%
SHU	Shuswap	25.7	Okanagan	55520	860701	15.50	N	7%
CHH	Chilliwack-Hope	21.0	Fraser Valley	50737	1083298	21.35	N	-2%
NCW	Nanaimo-North Cowichan	16.2	Vancouver Island & South Coast	52710	272042	5.16	N	2%
KAS	Kamloops-South Thompson	15.2	Cariboo-Thompson	54417	238375	4.38	Y	5%
PAQ	Parksville-Qualicum	14.4	Vancouver Island & South Coast	52037	95924	1.84	N	1%
SAN	Saanich North and the Islands	14.4	Vancouver Island & South Coast	56270	154283	2.74	N	9%
CWV	Cowichan Valley	13.7	Vancouver Island & South Coast	57357	168168	2.93	N	11%

PEN	Penticton	11.8 Okanagan	55492	190433	3.43	N	7%
JDF	Juan de Fuca	10.8 Vancouver Island & South Coast	52325	273649	5.23	N	1%
CMX	Comox Valley	9.8 Vancouver Island & South Coast	63557	249326	3.92	N	23%
MRM	Maple Ridge-Mission	9.5 Fraser Valley	56107	39022	0.70	N	8%
VRM	Vernon-Monashee	9.2 Okanagan	61400	503794	8.21	N	19%
KLA	Kelowna-Lake Country	9.1 Okanagan	58782	116617	1.98	N	14%
FLA	Fort Langley-Aldergrove	8.8 Fraser Valley	65799	23353	0.35	N	27%
WTK	Westside-Kelowna	7.9 Okanagan	57590	113977	1.98	N	11%
ABM	Abbotsford-Mission	7.6 Fraser Valley	53039	66314	1.25	N	2%
KMI	Kelowna-Mission	5.9 Okanagan	57977	54010	0.93	N	12%
ABS	Abbotsford South	5.5 Fraser Valley	53376	21110	0.40	N	3%
DLS	Delta South	5.2 Richmond & Delta	46648	46290	0.99	N	-10%
SRC	Surrey-Cloverdale	5.0 Surrey	73042	12145	0.17	N	41%
CHC	Chilliwack	4.6 Fraser Valley	52248	14605	0.28	N	1%
SRP	Surrey-Panorama	4.4 Surrey	69528	6150	0.09	N	34%
ESR	Esquimalt-Royal Roads	4.2 Vancouver Island & South Coast	50183	6816	0.14	N	-3%
RCE	Richmond East	4.1 Richmond & Delta	65312	9195	0.14	N	26%
NAN	Nanaimo	4.0 Vancouver Island & South Coast	52695	46245	0.88	N	2%
MRP	Maple Ridge-Pitt Meadows	3.9 Fraser Valley	55226	194522	3.52	N	7%
NVS	North Vancouver-Seymour	3.9 North Shore	53407	39567	0.74	N	3%
LLY	Langley	3.8 Columbia-Kootenay	64025	9467	0.15	N	24%
SAS	Saanich South	3.6 Vancouver Island & South Coast	50827	9207	0.18	N	-2%
OBG	Oak Bay-Gordon Head	3.4 Vancouver Island & South Coast	48889	32233	0.66	N	-6%
WCA	West Vancouver-Capilano	3.3 North Shore	55955	8002	0.14	N	8%
POM	Port Moody-Coquitlam	3.1 Tri-Cities	52740	8114	0.15	N	2%
ABW	Abbotsford West	3.1 Fraser Valley	50783	10503	0.21	N	-2%
SRT	Surrey-Tynehead	3.0 Surrey	58306	5967	0.10	N	13%
BNL	Burnaby-Lougheed	3.0 Burnaby & New Westminster	53383	3691	0.07	N	3%
SWR	Surrey-White Rock	2.8 Surrey	52281	6170	0.12	N	1%

CQM	Coquitlam-Maillardville	2.8 Tri-Cities	55576	3201	0.06	N	7%	0.86666667
VNP	Vancouver-Point Grey	2.7 Vancouver	57056	4417	0.08	N	10%	
POC	Port Coquitlam	2.6 Tri-Cities	55963	3464	0.06	N	8%	
DLN	Delta North	2.4 Richmond & Delta	53771	3184	0.06	N	4%	
SWH	Surrey-Whalley	2.3 Surrey	60399	2947	0.05	N	17%	
SRG	Surrey-Green Timbers	2.3 Surrey	57695	1921	0.03	N	11%	
CQB	Coquitlam-Burke Mountain	2.3 Tri-Cities	54418	61890	1.14	N	5%	
SRN	Surrey-Newton	2.3 Surrey	59828	1405	0.02	N	16%	
VTs	Victoria-Swan Lake	2.3 Vancouver Island & South Coast	50118	1828	0.04	N	-3%	
BNN	Burnaby North	2.2 Burnaby & New Westminster	58134	2446	0.04	N	12%	
SRF	Surrey-Fleetwood	2.1 Surrey	56925	2044	0.04	N	10%	
NEW	New Westminster	2.1 Burnaby & New Westminster	65893	1849	0.03	N	27%	
BNE	Burnaby-Edmonds	2.1 Burnaby & New Westminster	56893	2232	0.04	N	10%	
RCS	Richmond-Steveston	2.1 Richmond & Delta	59125	3137	0.05	N	14%	
VNQ	Vancouver-Quilchena	2.1 Vancouver	56448	2236	0.04	N	9%	
RCC	Richmond Centre	2.0 Richmond & Delta	66036	37381	0.57	N	28%	
VFV	Vancouver-Fraserview	2.0 Vancouver	59782	1295	0.02	N	15%	
BND	Burnaby-Deer Lake	2.0 Burnaby & New Westminster	55074	1375	0.02	N	6%	
VLA	Vancouver-Langara	1.9 Vancouver	57032	1543	0.03	N	10%	
NVL	North Vancouver-Lonsdale	1.8 North Shore	57091	2723	0.05	N	10%	
VMP	Vancouver-Mount Pleasant	1.8 Vancouver	54238	1311	0.02	N	5%	
VTB	Victoria-Beacon Hill	1.7 Vancouver Island & South Coast	51550	9838	0.19	N	0%	
VHA	Vancouver-Hastings	1.6 Vancouver	55796	1351	0.02	N	8%	
VKE	Vancouver-Kensington	1.6 Vancouver	57796	895	0.02	N	12%	
VKI	Vancouver-Kingsway	1.5 Vancouver	59342	875	0.01	N	15%	
VFA	Vancouver-Fairview	1.5 Vancouver	55361	893	0.02	N	7%	
VFC	Vancouver-False Creek	1.2 Vancouver	56218	671	0.01	N	9%	
VNW	Vancouver-West End	0.7 Vancouver	48596	1117	0.02	N	-6%	



CANADIAN UNION OF PUBLIC EMPLOYEES
BRITISH COLUMBIA DIVISION
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Office: 604-291-9119 Fax: 604-291-9043

Mark Hancock, President
Paul Faoro, Secretary-Treasurer

January 15, 2014

Via email: CPLOBoundaries@gov.bc.ca

CUPE BC is BC's largest union, representing 85,000 frontline public service workers in communities across the province.

Thank you for this opportunity to comment on proposed changes to the Electoral Boundaries Commission Act. As an organization that traditionally participates in public hearings about electoral boundaries, it is important to us that we also take the time to review and comment on the *White Paper*.

After reviewing the history summarized in the *White Paper*, along with the proposed changes, we also took the time to review the Supreme Court Cases referenced, the related legislation tabled (but not passed) in 2007, and reports submitted by previous Electoral Boundaries Commissions in this province in 1999 and 2008.

It is clear that a challenge exists in striking the right balance of effective and equitable representation between urban, suburban, rural and remote communities. It is also clear that this challenge is not new, and that previous commissions have struggled to find that balance within the constraints of the existing legislation.

Given the sequence of events surrounding the Cohen Commission in 2007 and 2008, when the government introduced related legislation while the Commission was in the midst of its mandate, it is also important that any changes to the *Act* be in place prior to the striking of the next Commission.

The question, however, is whether the proposed changes will allow the next Commission to achieve an appropriate balance of relative voter parity with regional representation.

As noted in the final report of the Cohen Commission in 2008:

"As long as representation by population is the starting point for the Supreme Court of Canada's interpretation of the right to vote in section 3 of the *Charter of Rights and Freedoms* and for an electoral boundaries commission's statutory mandate, there is a limit to how far a legislature can wander from that principle to accommodate the concerns of the residents of rural regions. As deviations from parity increase, the constitutional ice gets thinner and thinner.

.../2

W: cupe.bc.ca E: info@cupe.bc.ca



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CUPE BC

50 OF BUILDING
YEARS STRONG
COMMUNITIES



January 15, 2014

Page 2 – Submission re: Electoral Boundaries Commission Act proposed changes

January 15, 2014

We are not certain that the current proposal, to protect 17 specific constituencies while retaining a limit of 85 seats, strikes the needed balance. Indeed, it serves to further dilute representation for citizens of the remaining 68 constituencies. That dilution has the very real potential of being subject to a court challenge.

We believe that any change that sees the specific protection of regional constituencies within the legislation must be matched by a removal of the maximum number of electoral districts as currently set out in Section 3 (2) of the *Act*.

We note that Intergrity BC has called for the government to seek a constitutional court reference on the proposed amendments, and we note that the government took a similar tact when they proposed changes to the *Election Act* in 2012. We would encourage the government to seriously consider a court reference in respect of their proposed changes to the *Electoral Boundaries Commission Act*.

Finally, we also caution that specifically protecting 17 constituencies when the governing party has consistently represented a solid majority of them has the appearance of political gerrymandering. While this may not be factual, we feel the need to remind government that the perception of fairness will play an important role in the acceptance of any changes to what is a politically charged process.

Respectfully submitted,



Mark Hancock
President
CUPE BC



VILLAGE OF
BURNS LAKE
It's Only Natural!



January 14, 2014

Suzanne Anton – Minister of Justice
Room 232
Parliament Buildings
Victoria, BC
V8V 1X4

Hon. Suzanne Anton:

Re: Electoral Boundaries Commission Act

On behalf of the Village of Burns Lake Council and residents I would like to express the importance of MLA representation in northern ridings. No municipality knows this better than Burns Lake. Just two years ago our community faced a devastating tragedy that resulted in the loss of two lives, caused nineteen injuries, and affected more than five hundred direct and indirect jobs. This created much economic uncertainty and had major social impact. In a community as small and diverse as Burns Lake, we relied on the service and advocacy of northern and rural MLAs and the associated ministries. It proved extremely important to have elected MLAs work with First Nations, industry, and local governments in order to reach the common goal of rebuilding not only our mill, but our community as a whole.

Taking into account the geography of a northern riding, the scope of issues faced within each area, and the variety of community concerns, representation is reflected different light compared to urban ridings. While all ridings have important issues and concerns, the MLA who represents a remote rural riding has a disadvantage in terms of travel times, weather, and transportation.

Consider our riding of Nechako Lakes.

- We do not have an airport. Getting to and from Victoria is no small undertaking, and is not a “day trip”.
- Getting from one end of our riding to the other, from Houston to Vanderhoof, during a winter storm can be either unsafe or impossible.
- Many rural constituents, especially First Nations, live far off any highway.

Compare that to a riding like Victoria-Beacon Hill or Vancouver-West End where an MLA can walk from end to end of his or her riding in an afternoon and easily access meetings in Victoria or Vancouver.



www.burnslake.ca

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Over time, the issue of rural and remote representation has been made to fit a rep-by-pop model. Successive commissions in the 1980s, 1990s, and 2000s have put on band-aids to protect rural and remote seats, preserving the absolute number of seats at the expense of diluting their influence and expanding the size of the Legislature.

It's now time to declare that it is, in fact, fair and equitable to protect rural and remote seats. These seats are not a threat to democracy in an 85 seat Legislature and do not undermine urban BC, which holds the majority of seats.

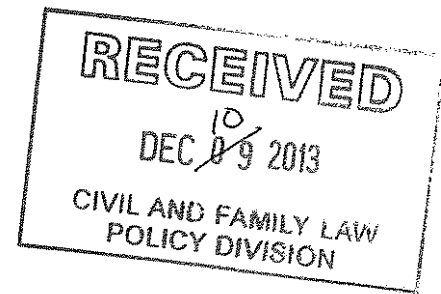
We only need to look at the federal House of Commons where we see ridings like Labrador being 5 or 6 times smaller than ridings in Toronto. We might also look at the Yukon or Nunavut or even Kenora. These ridings that are undersized by population and oversized by geography do not threaten our parliamentary system; rather, they strengthen it.

While the White Paper is only the beginning of the boundaries process, we support its direction to protect representation in rural and remote areas without expanding the size of the Legislature.

Sincerely,

A handwritten signature in black ink, appearing to read 'LW' with a stylized flourish.

Luke Strimbold
Mayor – Village of Burns Lake



November 27th, 2013

Civil Policy and Legislation Office
Justice Services Branch
Ministry of Justice
PO Box 9222 Stn Prov Govt
Victoria, B.C. V8W 9J1

Re: Electoral Boundaries Commission Act White Paper

To Whom It May Concern,

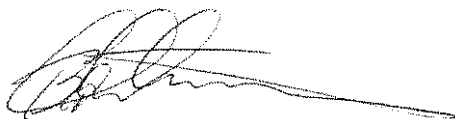
The North Central Local Government Association (NCLGA) supports the provincial governments' maintenance of electoral boundaries in the province to affirm and protect the democratic participation/representation of the residents of Northern BC.

The NCLGA is one of the five Area Associations within the Union of British Columbia Municipalities (UBCM). As a political entity, the NCLGA is a coalition of communities in north central British Columbia. The region we cover extends from above the 53rd parallel, from 100 Mile House to the Yukon border, west to Haida Gwaii and east to the Alberta border.

Our territory is an area equivalent to 68% of the Province's landmass, but the overall population of the region comprises only ten percent of the provincial total. The size, geographic location, and population of this region, harsh weather conditions, and a resource-based economy create challenges which are often very different from those of other areas of British Columbia. We are pleased that the Electoral Boundaries Commission has recognized these challenges in the November 2013 White Paper.

We thank you for considering the concerns of the north central region and the recommendations that the riding boundaries within the NCLGA region remain unchanged.

Sincerely,



Bruce D. Christensen
President, NCLGA